

Please consider revising the following FAR:

a. 14 CFR part 1

i. All definitions from 14 CFR parts 11 through 187 should be contained in part 1.

ii. Words that are used in the FAR that have meaning somewhat different from a Webster's Dictionary definition should be defined in part 1. Examples: "Used" aircraft, engine, propeller, part or appliance is not defined in 14 CFR, yet the word has a specific meaning. "Produces," "manufactures," and "submitted" are other examples that are used in the context of making an airworthiness determination but are not defined in the FAR.

iii. Rationale: Definitions are "sprinkled" throughout the various FAR parts or are lacking altogether. Finding some definitions and putting them in their proper context is sometimes difficult and cumbersome for the public, which leads to confusion and possible non-compliance with the regulations.

b. 14 CFR part 21

i. Issue NPRM as re-drafted by FAA with GE opportunity to comment and update position from 1998 submission of NPRM.

ii. Remove undue burden clauses from part 21. Rationale: The FAA staffs facilities world-wide, as appropriate, to certificate and perform certificate management functions for Repair Stations licensed under 14 CFR part 145. The FAA should staff likewise to support manufacturing operations internationally.

iii. Address international consortium arrangements in part 21. Rationale: Although one person may hold the Type Certificate for a product, many facilities could be licensed by the Type Certificate holder to use the FAA-approved design data to produce complete products or parts thereof. Persons located in other countries, different from the Type Certificate holder location, may obtain production authorizations from the Civil Air Authority where the production facility is located. Such arrangements require clarity with respect to who is responsible for the design, configuration, and quality of the product or parts. The FAR should allow multiple international production authorizations and the ensuing responsibility of the production authorization holder and the Civil Air Authority.

iv. Amend part 21 to allow and recognize work on complete products which is done by one Production Certificate (A) holder at another Production Certificate (B) holder's facility without having to formally extend Production Certificate A to facility B when Production Certificate holder A has company employees physically located at facility B to perform work under Production Certificate holder A's quality system.

v. Amend part 21.165(b) to clearly state at what point (when) an engine or propeller is submitted for airworthiness certification or approval. Rationale: Current 14 CFR part 21.165(b) states, "Determine that each part and each completed [product, including primary category aircraft assembled under a production certificate by another person from a kit provided by the holder of the production certificate,] submitted for airworthiness certification or approval conforms to the approved design and is in a condition for safe operation." There are only two times when an engine or propeller is "submitted" for airworthiness certification. One, when an applicant applies for an airworthiness certificate for the aircraft, including the engines, and, two, when an application for an export approval is presented to the FAA. A Production Certificate holder should have leeway to declare an engine or propeller airworthy at any given point in time when the engine or propeller meets the definition of airworthy. That point in time may not be when the identification plate is installed on the engine or propeller, or when the engine or propeller ships to an airframe manufacturer for installation on an aircraft due to hardware scheduling issues. For example, in today's lean manufacturing environment, there may be occasions when an engine or propeller is not airworthy

when shipped to an airframe manufacturer's facility. The condition of the engine or propeller is noted in the records and the engine or propeller made airworthy before issuance of the airworthiness certificate to the aircraft.

c. 14 CFR part 43

i. Section 43.3.j - Amend the section to read, "A manufacturer may--

(1) perform maintenance or alter any aircraft, aircraft engine, propeller, or part thereof manufactured by him under a Type or Production Certificate without the need for a certificate in addition to the Type or Production Certificate;"

ii. Rationale: A Type/Production Certificate holder manufactures a complete product and parts thereof, issues the Instructions for Continued Airworthiness, including the maintenance manuals, develops the tooling, and in some cases is the only person with the capability to perform critical and complex repairs. If a Type or Production Certificate holder has the capability to manufacture a complete product and part thereof, what is the safety issue that is corrected by that manufacturer having to hold a Repair Station license? Such "dual licensing" only adds an administrative burden to the certificate holder, and diverts FAA resources away from other critical safety functions.

d. 14 CFR part 45

i. Part Marking - The Department of Defense has issued an interim final rule with respect to Unique Item Identification (UID), which is contained in DFARS Clause 252.211-7003 and further explained in Department of Defense Guide to Uniquely Identifying Items. GE recommends the FAA coordinate with the Department of Defense to ascertain if UID requirements may be in concert with marking requirements proposed in the November 6, 1998 draft NPRM. A common set of requirements, where appropriate, would enhance safety.

ii. Rationale: Many companies, such as GE, produce complete products and parts for both the Department of Defense and the civil aviation market. In some cases products and parts are "common" from the perspective that the same product or parts is used both by DoD and in the commercial market. Levying two part marking requirements on industry will be cumbersome and expensive.

e. 14 CFR part 187

i. This part should be amended to coincide with bills passed by Congress that disallowed some fees now contained in part 187.